

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

BRIAN FIREBAUGH, *et al.*,

Petitioners,

v.

MERRICK B. GARLAND, in his
official capacity as Attorney General of
the United States,

Respondent.

No. 24-1130

STATEMENT OF ISSUES

Pursuant to the Court’s order of May 7, 2024, Petitioners Brian Firebaugh, Chloe Joy Sexton, Talia Cadet, Timothy Martin, Kiera Spann, Paul Tran, Christopher Townsend, and Steven King respectfully submit the following non-binding statement of the issues presented for review, without waiving their right to modify these issues or raise additional ones:

1. Whether the Protecting Americans From Foreign Adversary Controlled Applications Act (the “Act”) violates the First Amendment.
2. Whether the Court should declare the Act unconstitutional and enjoin its enforcement.

DATED: June 6, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing to be electronically filed with the United States Court of Appeals for the District of Columbia Circuit by using the appellate CM/ECF system on June 6, 2024.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

DATED: June 6, 2024

/s/ Ambika Kumar

Ambika Kumar

Counsel for Petitioners